

EXHIBIT 11

REDACTED VERSION OF DOCUMENT
SOUGHT TO BE SEALED

Exhibit 11

Plaintiffs' chart summarizing notes of alleged conspiratorial meetings identified in Plaintiffs' Application for Entry of Default Against the Irico Defendants, ECF No. 5191 at 10–11, and in Plaintiffs' Opposition to the Irico Defendants' Motion to Set Aside Default, and other meetings.

<u>No.</u>	<u>Date</u>	<u>Document</u>	<u>Description</u>	<u>Citation</u>
1	October 9, 1998	CHU00030679–83 (Dep. Ex. 1312)	An Irico vice-president attended an October 1998 “China CDT Maker Contact Meeting” with executives from Chunghwa, Philips, SDI, Orion and LG where, among other things, information about current and future production levels was exchanged and Irico was assigned to convene the next meeting.	ECF No. 5191-2, Ex. F
2	[REDACTED]	CHU00030684–87	[REDACTED]	Saveri Decl., Ex. 12
3	December 8/9/10, 1998	CHU00030688–91 (Dep. Ex. 1303)	Irico's president and executives from Chunghwa, Philips, SDI, LG, Orion and BMCC attended a “routine China CDT MAKER contact meeting” in Beijing in December 1998. Among other things, the meeting notes reflect IRICO's and others' current and future production levels. During one of the sessions, “it was suggested to follow the Japan makers' price increase\beginning on JAN/16 . . .”	ECF No. 5191-2, Ex. G

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<u>No.</u>	<u>Date</u>	<u>Document</u>	<u>Description</u>	<u>Citation</u>
4	January 8, 1999	CHU00030695-97 (Dep. Ex. 1301)	Irico, Chunghwa, Philips, SDI and Orion attended a "China CDT Maker Contact Meeting" on January 8, 1999 which included an exchange of production data. One participant urged that "[h]opefully none of the makers will publicize this and disrupt the makers adhering to the prices."	ECF No. 5191-2, Ex. H
5	[REDACTED]	CHU00030705-08	[REDACTED]	Saveri Decl., Ex. 13
6	[REDACTED]	CHU00030734-37	[REDACTED]	Saveri Decl., Ex. 14

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<u>No.</u>	<u>Date</u>	<u>Document</u>	<u>Description</u>	<u>Citation</u>
7	[REDACTED]	CHU00030752 – 55	[REDACTED]	Saveri Decl., Ex. 30
8	[REDACTED]	CHU00029191 – 94 (Dep. Ex. 1108)	[REDACTED]	Saveri Decl., Ex. 15
9	[REDACTED]	CHU00030769 – 70	[REDACTED]	Saveri Decl., Ex. 16

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<u>No.</u>	<u>Date</u>	<u>Document</u>	<u>Description</u>	<u>Citation</u>
10	[REDACTED]	CHU00029050–51 (Dep. Ex. 1315)	[REDACTED]	Saveri Decl., Ex. 17
11	[REDACTED]	CHU00030797–98	[REDACTED]	Saveri Decl., Ex. 19

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No.	Date	Document	Description	Citation
12	August 5, 1999	CHU00030819-33 (Dep. Ex. 1305)	Executives from Irico, Chunghwa, SDI, BMCC, Orion and Philips attended an August 5, 1999 "Mainland China CDT Market Exchange." Meeting notes describe future production plans and pricing agreements for 14, 15 and 17inch CDTs. A handwritten note on the report states "Absolutely cannot reduce price."	ECF No. 5191-2, Ex. I
13	[REDACTED]	CHU00030843-45	[REDACTED]	Saveri Decl., Ex. 21

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No.	Date	Document	Description	Citation
14	[REDACTED]	CHU00030979-84 (Dep. Ex. 1159)	[REDACTED]	Saveri Decl., Ex. 22
15	[REDACTED]	CHU00030992-94 (Dep. Ex. 1306)	[REDACTED]	Saveri Decl., Ex. 23
16	[REDACTED]	CHU00030995-97 (Dep. Ex. 1160)	[REDACTED]	Saveri Decl., Ex. 24
17	June 25, 2000	CHU0029110-15 (Dep. Ex. 2260)	On June 25, 2000, Irico's sales president discussed future CPT pricing with known conspirator Tony Cheng of Chunghwa, including that "IRICO could take the lead to raise the price when the market is still asking for reduction of production and promotion of sales." This followed a meeting between Cheng and senior Philips executives in which they asked Chunghwa to "negotiate again with IRICO to maintain a moderate price differential."	ECF No. 5191-2, Ex. J

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No.	Date	Document	Description	Citation
18	May 10/11/12, 2001	SDCRT-0087694	Senior executives from Irico, BMCC, LG, Chunghwa, Philips and SDI attended a May 2001 "Color CRT Industry Meeting" regarding CPTs. Irico urged "proper action" to overcome market saturation, and discussed with other co-conspirators setting prices "for the next three months" as well as other "necessary countermeasures." One co-conspirator noted that "[t]hough uniform CRT prices have been set many times, ultimately thorough enforcement is more important than price."	ECF No. 5191-2, Ex. K
19	[REDACTED]	CHU00036412-13 (Dep. Ex. 1177)	[REDACTED]	Saveri Decl., Ex. 25
20	August 9, 2001	SDCRT-0087700-02	In August 2001, Irico and co-conspirators Hitachi, BMCC, Chunghwa, Philips, LG and SDI considered two alternative production reduction proposals for CPTs and "Suggested Price" whereby "[each company must follow the above pricing and must not sell at a lower price through any unfair competition means." The participants also discussed an inspection mechanism, including written warnings and penalties, for those who violate the agreement.	ECF No. 5191-2, Ex. L
21	December 31, 2003	CHU00030067	On December 31, 2003, Irico met with Chunghwa in Shenzhen, China to discuss future production and plans. The report notes that Irico and Chunghwa "wish to once more exchange views regarding CPT factory production capacities."	ECF No. 5191-2, Ex. M
22	March 21, 2004	CHU00123358-61 (Dep. Ex. 1267)	During a March 2004 trip to Singapore for a glass meeting and "review of supply quantity and price hike" for CPTs, Chunghwa executive S.J. Yang reported that Irico successfully implemented a "price hike."	ECF No. 5191-2, Ex. N

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No.	Date	Document	Description	Citation
23	August 16/17, 2005	SDCRT-0091524-30	On August 16 and 17, 2005, SDI and Irico met in China to discuss and “[o]pinion for industry competition” that would “compose a Coalition [that] has binding power to enforce decisions.” Includes discussion of successful price maintenance.	ECF No. 5191-2, Ex. O
24	[REDACTED]	CHU00040992-93 (Dep. Ex. 1278)	[REDACTED]	Saveri Decl., Ex. 26
25	November 21, 2006	CHU00102752-54	At a November 21, 2006 meeting of the Color Tube Industry Presidents in Shanghai attended by co-conspirators BMCC, Hitachi, LPD, SDI and Thomson, Irico’s representative suggested and agreed to implement short-term production stops in response to challenge of how to “maintain the price.”	ECF No. 5191-2, Ex. P
26	[REDACTED]	CHU00102864-65	[REDACTED]	Saveri Decl., Ex. 28

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No.	Date	Document	Description	Citation
27	[REDACTED]	CHWA0022623-69	[REDACTED]	Saveri Decl., Ex. 29